

1 Jason C. Murray (CA Bar No. 169806)  
2 Robert B. McNary (CA Bar No. 253745)  
3 CROWELL & MORING LLP  
4 515 South Flower St., 40th Floor  
5 Los Angeles, CA 90071  
6 Telephone: 213-443-5582  
7 Facsimile: 213-622-2690  
8 Email: jmurray@crowell.com  
9 rmcnary@crowell.com

6 Jerome A. Murphy (*pro hac vice*)  
7 Astor H.L. Heaven (*pro hac vice*)  
8 CROWELL & MORING LLP  
9 1001 Pennsylvania Avenue, N.W.  
10 Washington, D.C. 20004  
11 Telephone: 202-624-2500  
12 Facsimile: 202-628-5116  
13 Email: jmurphy@crowell.com  
14 aheaven@crowell.com

11 *Counsel For ViewSonic Corporation*

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

17 IN RE: CATHODE RAY TUBE (CRT)  
18 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC  
MDL No. 1917

The Honorable Samuel Conti

19 This Document Relates to:

Individual Case No. 3:14-cv-02510

21 *ViewSonic Corporation v. Chunghwa*  
22 *Picture Tubes, Ltd. et al.*, No. 14-cv-02510

**DECLARATION OF ASTOR H. L.  
HEAVEN IN SUPPORT OF VIEWSONIC  
CORPORATION'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PURSUANT TO CIVIL LOCAL RULES 79-  
5(d) AND 7-11**

1 I, Astor H.L. Heaven, hereby declare as follows:

2 1. I am an attorney with the law firm of Crowell & Moring LLP, which represents  
3 ViewSonic Corporation (“ViewSonic”) in the above-captioned action currently pending in the  
4 United States District Court for the Northern District of California. I am a member in good  
5 standing of the District of Columbia and Maryland bars, and am admitted to appear in this Court  
6 *pro hac vice* in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. 07-5944-SC, MDL  
7 No. 1917 (“MDL 1917”). The matters stated herein are true to my own personal knowledge, and,  
8 if called as a witness, I could and would competently testify thereto.

9 2. I submit this declaration in accordance with Civil Local Rule 79-5 to set forth facts in  
10 support of ViewSonic’s Administrative Motion to File Under Seal Pursuant to Civil Local Rules  
11 79-5(d) and 7-11.

12 3. On June 18, 2009, the Court approved a “Stipulated Protective Order” in this matter (Dkt.  
13 No. 306) (the “Protective Order”)

14 4. Pursuant to the Protective Order and Local Rules 7-11 and 79-5(d), ViewSonic seeks to  
15 seal the following concurrently-filed documents: (a) the highlighted portions of ViewSonic’s  
16 Opposition to Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa (Malaysia) Sdn. Bhd.’s  
17 Motion for Partial Summary Judgment for Lack of Standing as to ViewSonic Corporation (the  
18 “Opposition”), and (b) Exhibits 4 and 53-57 to the Declaration of Astor H. L. Heaven in Support  
19 of ViewSonic’s Opposition (“Heaven Opposition Declaration”).

20 5. Exhibits 4 and 53-57 to the Heaven Opposition Declaration are documents and testimony  
21 designated by defendants Chunghwa Picture Tubes, Ltd. and Chunghwa (Malaysia) Sdn. Bhd. as  
22 “Confidential” or “Highly Confidential” under the terms of the Protective Order. The highlighted  
23 portions of the Opposition reference confidential information contained in these exhibits.

24 6. ViewSonic seeks to submit the material referenced herein under seal in good faith in  
25 order to comply with the Protective Order in this action and the applicable Local Rules.

26  
27 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
28

1 and correct.  
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3 Executed this 23rd day of December, 2014, in Washington, District of Columbia.  
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5 /s/ Astor H.L. Heaven  
6 Astor H.L. Heaven  
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